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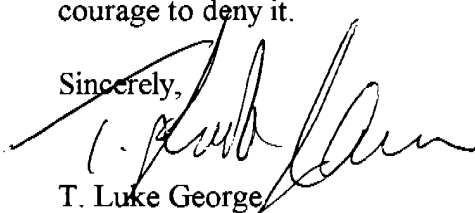
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Dear Dr. Halstead,

I rarely submit comments on EIS's but I feel compelled to voice my concerns regarding the EIS for the Headwaters HCP. I am sure that you have received many comments on various aspects of the HCP but let me add some information that perhaps you and others at the Fish and Wildlife Service may not be aware of. My graduate students and I have found that Varied Thrushes (*Ixoreus naevius*) are absent from small (<16 ha) redwood forest stands (Hurt 1996). In addition, several species appear to be edge sensitive, avoiding clearcut edges and perhaps suffering higher nest predation along edges (Brand 1998). Brand (1998) found that edge effects may extend as far as 100 m into the forest for Brown Creepers (*Certhia americana*), Pacific-slope Flycatchers (*Empidonax difficilis*), Winter Wrens (*Troglodytes troglodytes*), and Varied Thrushes (*Ixoreus naevius*). Thus, the riparian protection areas as provided in the Headwaters HCP may be all edge for these species. In addition, some bird species may not breed in small forest fragments leading to declines of many forest birds on highly managed timberlands.

I am not so concerned that the information that my students and I have been compiling is not included in the HCP, I realize that it has only recently been published and the species involved are not threatened. What concerns me the most is that we know so little about the ecological relationships of species in redwood forests. Given our lack of knowledge, how can we possibly develop a reasonable conservation plan for the PL land for the next 50 years? In effect we are saying that any new ecological research that is conducted over the next five decades can be ignored when managing Palco land. That is like a health insurance company saying that they will provide you with health insurance for the next 50 years but you cannot use any new medicines, procedures, or knowledge that is discovered after you sign the contract. The Headwaters HCP flies in the face of sound scientific management of our natural resources. I hope you will have the courage to deny it.

Sincerely,


T. Luke George

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Literature cited

- Brand, A. 1998. Edge effects in coast redwood forest fragments. Masters Thesis. Humboldt State University.
- Hurt, M. 1996. The influence of forest fragmentation and vegetation structure on the breeding distribution of Varied Thrushes in redwood forest. Masters Thesis. Humboldt State University.